

Agenda Date: November 10, 2004
Item Number: A2

Docket: UT-041765

Company Name: Verizon Northwest, Inc.

Staff: Rebecca Beaton, Senior Analyst
Bob Williamson, Senior Engineer
John Cupp, Consumer Program Specialist

Recommendation:

Take no action, thereby allowing the Verizon Northwest, Inc., tariff filing for E911 services in Docket UT-041765 to go into effect by operation of law.

Background:

On September 28, 2004, Verizon Northwest Inc., ("Verizon") filed Advice No. 3128 in Docket UT-041765 to revise its current Enhanced Emergency Number service (E-911) tariff. In this filing, Verizon will now provide geographic diversity and physical redundancy in the company's E-911 network to reduce the affect in the event of a catastrophic network failure. The proposed tariff revises the current rate structure and includes options where a customer may order dual selective routing. The proposed services are provided on a three-year term commitment basis. These tariff elements are available only to E-911 Public Safety Answering Point's (PSAP) and the E-911 Emergency Management Division (EMD.)

Verizon's tariff includes recommended E-911 network configurations: Dual Mode Automatic Location Identification (ALI) Storage Processing, Dual Mode Selective Routing, and Disaster Recovery with Network Control Modem. The tariff additionally provides: Wireless Functionality, Call Associated Signaling (CAS), Phase I and Phase II Non-call path associated signaling (NCAS) and Wireline Compatibility Mode.

The ALI database, subscriber line and subscriber database charges are deleted from the current tariff and replaced by a single monthly recurring charge the company asserts should simplify billing for customers. In general, the tariff streamlines existing charges and puts in tariff services that have been provided previously on individual case basis contracts. The annual net revenue impact of this filing is estimated to be \$1,056,731.

Discussion:

Verizon is upgrading the E-911 network design to keep current with national standards. By means of the proposed Verizon filing, all companies providing E-911 services in Washington have now filed tariffs for wireline and wireless Phase I and Phase II cellular location identification networks. FCC rule 47 CFR 20.18 (d) and (e) require deployment of Phase I (provision of telephone number of the originator of a 911 call and the location of the cell site or base station receiving a 911 call from any mobile handset accessing their systems to the PSAP) and Phase II (provision to the PSAP the location of all 911 calls by longitude and latitude in conformance with Phase II accuracy requirements.) As a whole, Washington State counties have upgraded PSAPs to handle new cellular location services.

Commission Staff (Staff) has been working with Verizon on the public notice aspect of the tariff filing since July, 2004. Verizon has collaborated with the PSAPs and EMD on their tariff proposal and network configuration since October 2003. Verizon has addressed the 911 community concerns, including those for dual routing options and by providing the services through a tariff. Additionally Staff, PSAPs and EMD concur the appropriateness of such services through tariff rather than the current method of individual contracts. Verizon has responded to detailed Staff inquiries on pricing and tariff language over the course of the investigation.

Staff received positive comments from Island County, Snohomish County, King County and EMD regarding the proposed tariff and network design. Verizon briefed each affected county individually, submitted detailed customer notices in compliance with the Commission rules and notified the 911 Statewide Advisory Committee, which includes representatives of all county PSAPs. There were no objections.

The company's proposed tariff will replace the current individual case basis (ICB) contracts. Staff notes there are available to PSAPs competing services by another local exchange company. Thus PSAPs may choose the services and company that best suit their needs. Staff is confident PSAPs and EMD have the necessary tariff and network information to make appropriate customer decisions. Verizon has also notified customers that transport charges in the proposed tariff may change in 2005 based on the outcome of the Verizon General Rate Case in Docket UT-040788.

Conclusion:

Commission Staff recommends the Commission take no action, thereby allowing the Verizon tariff in Docket UT-041765 to go into effect by operation of law.